



**Livestock and Seed Program  
Audit, Review, and Compliance Branch  
Quality System Audit Report**

**AUDIT INFORMATION**

<b>Applicant Name:</b>	Organizacion Internacional Agropecuria (OIA)
<b>Est. Number:</b>	Not Applicable
<b>Physical Address:</b>	Av. Sante Fe 830, Acassuso B1641ABN, Buenos Aires, Argentina
<b>Mailing Address:</b>	Same
<b>Contact &amp; Title:</b>	Pedro Landa, Technical Director
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<b>Phone Number:</b>	54 11 4793-4340
<b>Auditor(s):</b>	Corey Gilbert, Lead Auditor; Martin Friesenhahn, Auditor
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	November 15, 2007 – January 25, 2008
<b>Audit Identifier:</b>	NP7319ZZA
<b>Action Required:</b>	Yes
<b>Audit Type:</b>	Surveillance – Accreditation Renewal Audit
<b>Audit Objective:</b>	To verify continuing compliance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the previous non-compliances from the 2006 annual update audit.
<b>Audit Criteria:</b>	7 CFR Part 205.510 National Organic Program, Final Rule, dated December 21, 2000, updated September 11, 2006.
<b>Audit Scope:</b>	OIA's quality manual dated October 1, 2007, including personnel, processes, procedures, facilities, and related records.
<b>Location(s) Audited:</b>	OIA office in Acassuso, Buenos Aires, Argentina; La Ventura and La Maria Sur crop and livestock operator in Bordenave, Argentina; Swift processor in Rosario, Argentina; and ECA SA wild crop operator in San Martin, Argentina.

The Organizacion Internacional Agropecuaria (OIA) 5 Year Re-Accreditation Audit process started on November 15, 2007, with a review of the documents submitted by OIA and culminated with the on-site surveillance audit which was conducted on January 21 – 25, 2008.

OIA is a for-profit organization which was accredited as a certifying agent on October 16, 2002, to the USDA National Organic Program (NOP) for crops, wild crops, livestock, and handling operations. The OIA client list included approximately 224 NOP certified clients with 116 crop, 2 wild crop, 35 livestock (2 beef cattle and 33 apiculture), and 71 handling operations certified to the NOP Standards. The majority of NOP certified clients are located in Argentina with a small number in Brazil and Uruguay.



## Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

OIA is also accredited by the International Organic Accreditation Service (IOAS) for IFOAM, National Agri-food Health and Quality Service - Argentina for organic certification according to EEC 2092/91 Standards, and the National Institute of Metrology, Standardization, and Industrial Quality – Brazil for ISO Guide 65 to apply EN 45011.

The application and files for initial certification are reviewed by the IBD certification staff. The annual updates are reviewed by OIA certification staff and inspectors based on qualifications. The inspections are conducted by OIA staff inspectors or OIA contract inspectors based on location, qualifications, and area of specialization. The final review for certification is made by the OIA Certification Committee (minimum of three members) with the final certification decision made by the Technical Director.

The audit included observations of four renewal inspections by OIA. The crop and livestock inspection was conducted at the same operation and included organic beef cattle, pastures, grains, and sunflowers. The wild crop inspection included organic wild oranges and grapefruit. The processor/handling operation included the production of organic beef bone stock.

### FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that OIA is currently operating in compliance to the requirements of the audit criteria. The corrective actions for the non-compliances from the 2006 annual update audit were verified and found to be implemented and effective. Therefore, the non-compliances were cleared. Two non-compliances were identified during the audit.

**NP6342GGA.NC1 – Major – Cleared** – NOP § 205.510(a)(1) states, “An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees (1) A complete and accurate update of information submitted pursuant to §§205.503 and 205.504.” NOP § 205.504(a)(3) requires the certifying agent to provide a description of the qualifications, including experience, training, and education in agriculture, organic production and organic handling for: (ii) each person to be designated by the applicant to review or evaluate applications for certification. *Evidence of education, training or experience was not provided for the following personnel; The Quality Manager, the Deputy Director, Coordinator of Inspectors, and Certificate Issuer.* **Corrective Action:** The evidence of education, training, and experience was provided and reviewed on-site for the Quality Manager, the Deputy Director, Coordinator of Inspectors, and Certificate Issuer.

**NP6342GGA.NC2 – Major – Cleared** – NOP § 205.501(a)(11)(v) requires all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report. *OIA submitted a summary sheet listing personnel and their conflicts including familial conflicts. Individual conflict of interest declarations were not provided as required. The sheet provided does not indicate the effective date of the conflicts listed. Additionally the listing did not contain the conflict information for the Quality Manager, Inspection Coordinator, or the Certificate Issuer.*



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**Corrective Action:** The conflict of interest (COI) declarations for the previous and current year were reviewed on-site. All staff and contracted employees had individual COI declarations on file.

**NP6342GGA.NC3 – Minor – Cleared** – NOP § 205.404 (c) states, “Once certified, a production or handling operation’s organic certification continues in effect until surrendered by the organic operation or suspended or revoked by the certifying agent, the State organic program’s governing State official, or the Administrator.” *The certificates contained in the files submitted for review were not consistent in regards to the length of validity of the certificate. Three of the four files reviewed indicated that the certificate was valid for one year, and one indicated the certificate was valid until surrendered, suspended or revoked. The certificate validity implies the certification is only valid for one year.* **Corrective Action:** OIA revised all certificates to list the effective date of certification and state the certificate is valid until surrendered, suspended or revoked.

**NP6342GGA.NC4 – Minor – Cleared** – NOP § 205.403(d) states, “Exit interview. The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern.” *The inspection reports and documents in the files reviewed did not indicate that an exit interview was conducted or that the inspector addressed the need for any additional information or issues of concern.* **Corrective Action:** The Inspection Minutes (Exit Notes) were provided and reviewed on-site for each previously submitted file and all contained the inspection findings and signature/date of the inspector and operator confirming the exit interview. All additional files reviewed during the current audit also had the detailed Inspection Minutes.

**NP7319ZZA.NC1** – NOP §205.404(c) states, “Once certified, a production or handling operation’s organic certification continues in effect until surrendered by the organic operation or suspended or revoked by the certifying agent, the State organic program’s governing State official, or the Administrator.” *The OIA NOP certificates do not have the original certification effective dates; although, it does have the statement that the certificate is valid until surrendered, suspended or revoked. The organic certificate is automatically being printed with an effective date that is the date of the most recent certification decision.*

**NP7319ZZA.NC2** – NOP §205.404(a) requires the certifying agent to review the on-site inspection report and any additional information requested from or supplied by the client; NOP §205.601(e)(2) allows the use of boric acid as a structural pest control with no direct contact with the crop or soil. *OIA allowed the use of boric acid incorporation into soil as a micronutrient based on soil analyses conducted by the client showing a soil deficiency in boron. The operator’s file (#90,020) and technical review doesn’t document that boron deficiency was discussed or that the use of boric acid was approved based on the soil deficiency.*